

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,)	
)	
Petitioner/Judgment Creditor,)	
)	
v.)	Case No. 14-FJ-05-HE
)	
NOVA GROUP, INC.,)	
)	
Respondent/Judgment Debtor,)	
)	
AVON CAPITAL, LLC,)	
)	
Respondent/Judgment Debtor,)	
)	
ASSET SERVICING GROUP, LLC,)	
)	
Respondent/Garnishee,)	
)	
SDM HOLDINGS, LLC,)	
)	
Respondent/Garnishee,)	
)	
and)	
)	
AVON CAPITAL, LLC, a Wyoming Limited)	
Liability Company,)	
)	
Intervenor.)	

**APPLICATION FOR ORDER APPROVING DISTRIBUTION
OF SDM HOLDINGS, LLC, TO ITS SOLE MEMBER,
AVON CAPITAL, LLC, IN RECEIVERSHIP**

Comes now the Receiver, Ryan Leonard, and submits, at the request of the Manager of SDM Holdings, LLC (“SDM”), this Application for an order approving a distribution from SDM to its sole member, Avon Capital, LLC, a Wyoming limited liability company, in receivership (“Avon Capital”). This requested distribution will be utilized to pay the

Receiver's fees and costs incurred in the month of January 2024. In support of this Application, the Receiver states as follows:

1. On January 4, 2024, this Court entered an Order appointing Ryan Leonard as the Receiver for Avon Capital [Doc. No. 565].

2. Pursuant to the authority granted to the Receiver by this Court, the Receiver exercised its membership rights as to SDM and appointed Nicole Jacobsen as Manager effective January 9, 2024.

3. The Manager of SDM has advised the Receiver of the following facts:

- A. As of the date of this Application, monthly premium payments have been made from the bank account at Kirkpatrick Bank held in the name of ASG, LLC f/b/o SDM Premium (the "Bank Account") in the amount of \$119,261.49, which represents premium payments for March, April and May 2024;
- B. The monthly fees and expenses payable to ASG for servicing the premium payments and processing death benefits through April 2024 were paid the date of this filing in the amount of \$18,562.42;
- C. As of the date of this Application, following the premium payments and the payment of ASG's monthly fees and expenses, the cash balance in the Bank Account is \$35,538.66;
- D. The SDM Manager's monthly compensation, which is paid from the Bank Account, is \$2,000.00;
- E. As of the date of this Application, there are six (6) matured policy benefits due and payable to the Bank Account which total \$383,050.59.

4. The Manager of SDM advises there is an amount available for a distribution to its sole member, Avon Capital, in the amount of \$5,167.50.

5. The amount of \$5,167.50 is the amount of the Receiver's January 2024 fees and expenses which were approved by the Court on March 21, 2024 [Doc. No. 614].

6. The Manager proposes the amount of \$5,167.50 be paid from the Bank Account to an account at NBC Bank established by the Receiver for this specific purpose.

WHEREFORE, the Receiver, at the direction of the Manager of SDM, respectfully requests this Court enter an Order authorizing a distribution from SDM to its sole member, Avon Capital, in receivership, for payment of the Receiver's fees and expenses incurred in January 2024, which has previously been approved by this Court.

DATED: March 25, 2024.

Respectfully submitted,

s/ Heidi J. Long

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Attorney for the Receiver

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2024, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

s/ Heidi J. Long
Heidi J. Long